

1 **EDWARD TAROLLI, SBN 358412**  
2 [edward.tarolli@fitzhunt.com](mailto:edward.tarolli@fitzhunt.com)  
3 **FITZPATRICK, HUNT & PAGANO, LLP**  
4 633 West Fifth Street, 60<sup>th</sup> Floor  
Los Angeles, CA 90071  
Tel.: (213) 873-2100

5 **BRIAN T. MAYE (*Pro Hac Vice*)**  
6 [brian.maye@fitzhunt.com](mailto:brian.maye@fitzhunt.com)  
7 **FITZPATRICK, HUNT & PAGANO, LLP**  
8 10 South LaSalle Street, Suite 3400  
Chicago, IL 60603  
Tel.: (312) 728-4000 / Fax: (312) 728-4950

9 Attorneys for Defendant,  
10 FRONTIER AIRLINES, INC.

11 **UNITED STATES DISTRICT COURT**  
12 **CENTRAL DISTRICT OF CALIFORNIA**  
13

14 ANNE HEITING, an individual,  
15  
16 Plaintiff,

17 vs.

18 FRONTIER AIRLINES, INC., a  
19 Colorado corporation; DOES 1 through  
20 25, inclusive,  
21 Defendants.

CASE NO. 2:25-cv-01375 SPG (PDx)  
*[Assigned to Hon. Sherilyn Peace Garnett]*

**DEFENDANT'S NOTICE OF  
SETTLEMENT IN PRINCIPLE AND  
MOTION TO VACATE ALL  
DEADLINES**


22 The parties respectfully notify the Court that the parties have agreed in  
23 principle to settle the above-captioned matter. Counsel for the parties are in the  
24 process of preparing and finalizing the Settlement Agreement and Stipulated  
25 Dismissal ("Agreement"). The parties intend to file the stipulated dismissal as soon  
26 as practicable, but respectfully request that the parties are given 30 days to file the  
27 said stipulated dismissal. Accordingly, Defendant respectfully requests that the  
28 ///

1 Court vacate the responsive pleading deadline as set forth in the April 10, 2025,  
2 Order Granting Second Stipulation for Extension of Time to File Answer.

3 Defendant is filing this Notice and Motion with Plaintiff's approval and  
4 permission.

5  
6 DATED: April 23, 2025

FITZPATRICK, HUNT & PAGANO, LLP

7  
8 By:   
9 \_\_\_\_\_  
10 Edward Tarolli  
11 Brian Maye  
12 Attorneys for Defendant,  
13 Frontier Airlines, Inc.  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**CERTIFICATE OF SERVICE**

I hereby certify that on this 23<sup>rd</sup> day of April 2025, a copy of the foregoing document was electronically filed with the Clerk of the Court at USDC, Central District of California, using CM/ECF system, which will send notification of such filing to all parties in this action.



\_\_\_\_\_  
Martha L. Rodriguez